

# Coalition For A Safe Environment

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California Energy Commission  
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CALIF ENERGY COMMISSION

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Reference: Petroleum Infrastructure Environmental Performance Report (PIEPR)  
Docket # 04-IEP-01A  
2005 Energy Report - Transportation Energy Reports  
Subject: Public Comments

The Coalition For A Safe Environment wishes to submit the following public comments regarding the California Energy Commission's proposed scope and contents outline for the 2005 Petroleum Infrastructure Environmental Performance Report.

**1. What are the characteristics of California's petroleum infrastructure from 1985 to 2003?**

The California Petroleum Industry has failed to plan the replacement of aging facilities, storage tanks, pipelines and valve connections. Most major accidental air pollution emissions and water contamination were caused by equipment breakdowns that were 20 years or more in age. The average Southern California pipeline age is over 40 years old.

The Petroleum Industry waits for equipment to break before it is replaced. Not one petroleum company has a plan to replace all of its aging pipelines. There has been no new refinery built in the last 20 years because corporate owners refuse to invest in replacing aging facilities, refuse to invest in new technologies and refuse to comply with environmental laws. The Petroleum Industry believes their monopoly can dictate better terms in the future when the public is held at gun point with manipulated skyrocketing fuel prices and no alternatives.

**2. What are the historical trends of environmental, and public and safety attributes of petroleum infrastructure?**

- A. The public is demanding more stringent environmental standards.
- B. The public is demanding higher fines and sanctions.
- C. The public is demanding higher quality product standards.
- D. The public is demanding the Petroleum Industry pay its fair share of public health care costs.
- E. The public is demanding the Petroleum Industry pay its fair share of environmental restoration.
- F. The public is demanding the Petroleum Industry disclose all public health hazardous of all chemicals and products it manufactures.

3. **What are the environmental, public health and safety trends associated with:**

**A. Importing increased quantities of petroleum and refined products through existing or expanded marine terminals.**

1. The public and every community where a refinery, storage tank facility, pipelines or marine terminal is located is demanding a moratorium on production and expansion.
2. Every community where a refinery, storage tank facility, pipeline and marine terminal is located is plagued with respiratory and numerous other health problems which is getting worse every year due to daily, yearly and cumulative exposure to toxic, carcinogenic and hazardous chemicals from the Petroleum Industry.
3. Every community where a refinery, storage tank facility, pipeline and marine terminal is located has its public land, private property, public parks, public schools, lakes, rivers and oceans contaminated with toxic, carcinogenic and hazardous chemicals from the Petroleum Industry.
4. Californians are politically aware that our problems with the Petroleum Industry are shared throughout the world and are demanding that any US Petroleum Industry company not do business with a country, government or business that does not comply with international environmental, safety, employment and human rights laws.

**B. Transporting increased quantities of petroleum and refined products through existing and expanded pipelines or other deliverable systems like rail and tanker trucks.**

1. Every community where pipelines, rail yards, truck depots or intermodal facilities are located is demanding a moratorium on increased production, expansion and distribution.
2. Every community where pipelines, rail yards, truck depots or intermodal facilities are located is plagued with respiratory and numerous other health problems which is getting worse every year due to daily, yearly and cumulative exposure to toxic, carcinogenic and hazardous chemicals from breakdowns, spills and truck & train air pollution.
3. Every community where pipelines, rail yards, truck depots or intermodal facilities are located is faced with annually increasing noise, traffic congestion and truck & train accidents.
4. Every community where pipelines, rail yards, truck depots or intermodal facilities are located has its public land, private property, public parks, public schools, lakes, rivers and oceans contaminated with toxic, carcinogenic and hazardous chemicals from the Petroleum Industry.

**C. Storing increased quantities of petroleum and refined products.**

1. Every community where storage tank facilities are located are demanding a moratorium on increased production, expansion and distribution.
2. Every community where storage tank facilities are located is plagued with respiratory

and numerous other health problems which is getting worse every year due to daily, yearly and cumulative exposure to toxic, carcinogenic and hazardous chemicals from daily storage, product mixing, breakdowns, spills, truck and train air pollution.

3. Every community where storage tank facilities are located is faced with annually increasing air pollution emissions, traffic congestion, truck and train accidents.
4. Every community where storage tank facilities are located has its public land, private property, public parks, public schools, lakes, rivers and oceans contaminated with toxic, carcinogenic and hazardous chemicals.

**D. Expanding refining capacity to increase efficiency and throughput.**

1. Expanding refining capacity does not increase efficiency new technology at new facilities increases efficiency and throughput. No petroleum company has proposed or is building a new facility. No petroleum company has proposed or is currently replacing its existing facility.
2. Every community where refineries are located are demanding a moratorium on increased production or expansion and will not support approval of a permit to expand.
3. Every community where a refinery is located is plagued with respiratory and numerous other health problems which is getting worse every year due to daily, yearly and cumulative exposure to toxic, carcinogenic and hazardous chemicals from daily production, daily production noise, product mixing, breakdowns, spills, truck & train noise & air pollution and will not support approval of a permit to expand.
4. Every community where a refinery is located is faced with annually increasing air pollution emissions, noise, traffic congestion, truck & train accidents and will not support approval of a permit to expand.
5. Every community where a refinery is located has its public land, private property, public parks, public schools, lakes, rivers and oceans contaminated with toxic, carcinogenic and hazardous chemicals and will not support approval of a permit to expand.

**4. What challenges do environmental trends present to future development of petroleum infrastructure?**

- A. No environmental organization in California will support any future development or expansion of petroleum infrastructure.
- B. No community in California where a refinery is located will support any future development or expansion of petroleum infrastructure.
- C. Every community in California where a refinery is located wants them to move out of state. Local communities receive no price discount on gas or any other significant benefit from refineries. More new businesses and jobs can be created on the massive land area refineries currently have.
- D. The California public want current environmental laws to be more stringent.

- E. The California public want refineries to reduce air pollution 95%.
- F. The California public wants refineries to pay their fair share of environmental restoration
- G. The California public wants refineries to pay their fair share of public health care costs.

**5. What information do local, regional, and state agencies need to address future environmental trends from petroleum infrastructure development?**

- A. The truth. Public Health Impact. Accurate information of over 31 public health illnesses, diseases, cancer both short term and long term, including hereditary caused by the petroleum industry.
- B. The truth. Public Incurred Costs (City, County, State & Federal): Accurate estimates of environmental damage costs, public water & infrastructure support costs, public health care costs, transportation infrastructure support costs (public roads, highways, bridges, railways), CEQA & NEPA etc. public costs for petroleum industry, both short term and long term.
- C. The truth. Petroleum industry non-compliance information: Accurate reporting of the number of violations, number of repeat violations, number of fines, fine amounts, number of public complaints, number of equipment breakdowns,
- D. The Truth. The Petroleum Industries Failure To Use The Best Available Technology (BAT). In every investigation by a non-profit environmental group it has been discovered that the BAT was not being used, is not being proposed to be used and governmental regulating and permitting agencies are allowing the petroleum industry to get away with it.
- E. The Truth. Accurate Negative Environmental, Public Health & City Costs Impact Projection Information.

**6. What policy recommendations should be made to ensure that environmental, public health and safety trends are addressed?**

- A. Environmental laws be increased & enforced for the Petroleum Industry.
- B. Penalties, sanctions and fines be increased 100X & enforced for the Petroleum Industry.
- C. That waivers and extensions be eliminated.
- D. Credit (RECLAIM, ERC's) programs be eliminated.
- E. Petroleum Industry companies be assessed a fee (per barrel, gallon, product) for environmental restoration.
- F. Petroleum Industry companies be assessed a fee (per barrel, gallon, product) for public health care costs.
- G. Petroleum Industry companies be assessed a fee (per barrel, gallon, product) for public transportation infrastructure.

- H. Petroleum Industry companies be assessed a fee (per barrel, gallon, product) for public utilities infrastructure.
- I. Petroleum Industry companies be assessed a fee (per barrel, gallon, product) for waste site infrastructure.
- J. No new construction or expansion be permitted in Environmental Injustice communities.
- K. The Petroleum Industry be required to establish a plan to reduce air pollution 95% within 5 years.
- L. That every Petroleum Industry company be required to have a Community Advisory Committee. Oil is a natural resource owned by the public and held in trust by the State of California.
- M. That the State of California solely or in cooperation with non-profit organization(s) began planning the construction of publicly owned refineries, publicly owned pipelines and storage facilities.
- N. The State of California regulate the price of fuels and profit margins.
- O. The State of California eliminate Brokers in the Petroleum Industry.
- P. The State of California support and invest in alternative fuels and energy technologies.
- Q. The State of California endorse the international Kyoto Agreement.
- R. Governmental agencies change the definition of public odor nuisance into two categories: one that is an obnoxious odor (basically harmless) and one that states public exposure to toxic, carcinogenic and hazardous chemicals.

**7. Environmental Areas to be addressed:**

**A. Air Quality, including global warming**

**Staff will assess the contribution of petroleum facilities to air basin emissions of criteria pollutants in 1990 and 2003.**

1. We request that the assessment include the year 2004. The Petroleum Industry had major and numerous breakdowns at oil refineries, pipelines and valve connections in the year 2004 that occurred in residential communities and wetlands in the State of California.
2. We request that Retail Distribution Fuel Stations - Gasolene, Diesel, Jet Fuel & Alternative Fuels be included in the assessment. An assessment of Petroleum Industry air basin omissions would be significantly underestimated if the tens of thousands of retail outlets are not included. It is a fact that 99% of retail outlets are located in communities, therefor contributing to environmental damage and increasing public health crisis and more frequent gas station explosions.
3. We request that Petroleum Industry Oil Well Locations be included in the assessment.

In the State of California there are thousands of operating and non-operating oil wells located in residential communities, in residential blocks, near public schools (elementary), child care facilities, near public recreational parks, youth sports fields complexes, public lakes, rivers & beaches, public streets, highways, bridges, public municipal buildings, retail & commercial businesses, senior care facilities and hospitals.

4. We request that Petroleum Industry Above-Ground Pipeline Valve Connections be included in the assessment.

In the State of California there are hundreds of pipeline valve connections located in residential communities, in residential blocks, near public schools (elementary), child care facilities, near public recreational parks, youth sports fields complexes, public lakes, rivers & beaches, public streets, highways, bridges, public municipal buildings, retail & commercial businesses, senior care facilities and hospitals.

5. We request that Petroleum Industry Train Rail Distribution Routes be included in the assessment.
6. We request that Petroleum Industry Public Transportation Truck Distribution Routes be included in the assessment.
7. We request that Gas Refineries (Propane, CNG, Methanol etc., Non-Oil/Liquid Fuel Products) be included in the assessment.
8. We request that Gas Industrial/Commercial Manufacturing-Storage Facilities be included in the assessment.
9. We request that an estimated cost of damage, loss, replacement and restoration be determined.
10. We request that CEC, every California Governmental Environmental & Public Health Regulatory Agency and elected official endorse the Kyoto Agreement. CEC has the authority to endorse the Kyoto Agreement on its principal.

## **B. Biological Resources**

### **a. Refineries - Assess affects on habitat and sensitive species from ongoing operation.**

1. We request that the assessment include water contamination (fresh water reservoirs, lakes, rivers & oceans) short term and long term impacts.
2. We request that the assessment include land contamination (on-site, off-site local communities i.e. residences, public schools, public parks, open land & agricultural short term and long term.
3. We request that the assessment include a biological analysis of all domestic and wildlife animal species health for above normal incidents of diseases and cancer.

4. We request that the assessment include an analysis of the absence and degradation of wildlife habitat.
  5. We request that an estimated cost of damage, loss, replacement and restoration be determined.
- b. Crude and Product Pipelines - Assess affects on biological resources from construction and from accidental spills.**
1. We request that the assessment include the relocation and disposal of contaminated soil to public land fills.
  2. We request that the assessment include demolished facilities, tanks, pipelines and equipment disposal at land fills.
  3. We request that an estimated cost of damage, loss, replacement and restoration be determined.
- c. Marine Terminal - Assess affects of increased imports on biological resources from dredging operations and accidental spills.**
1. We request that the assessment include the temporary relocation of soils to drying areas, the introduction of contaminated soils to uncontaminated site locations, increasing of site contaminated soils and disposal of contaminated soil to public land fills.
  2. We request that the assessment include a cumulative site and environment impact analysis.
  3. We request that an estimated cost of damage, loss, replacement and restoration be determined.
- d. Clean Up Options For Oil Spills - Assess residual contamination levels after clean up and the potential long term affects on biological resources.**
1. We request that the assessment include loss of aquatic foods i.e. clams, mussels, shrimp, fish and kelp etc..
  2. We request that an estimated cost of damage, loss, replacement and restoration be determined.

**C. Environmental Justice**

**a. Present demographic data from the 1980, 1990 and 2000 Censuses.**

1. We request that the data include post Census 2000 undercount increases.
2. We request that maps be prepared showing ethnic minority population density and children age distribution relative to facilities, pipelines etc..
3. We request that maps, studies etc. be prepared that document the

disproportionate health impact that Environmental Justice communities near Petroleum Industries have incurred.

4. We request that maps, studies etc. be prepared that document the disproportionate public costs the EJ communities, municipalities and governmental agencies incur.

**b. Identify environmental and public policy issues of concern to populations living near refineries and fuel storage terminals.**

1. Governmental agencies, cities, ports, elected, appointed and hired officials blatantly disregard the legal rights of ethnic minorities, protected classes and the public at large. Districts that are in federal non-compliance should be prohibited from approving any new permits or licences for new construction, expansion or business operation. However, cities and air quality management districts approve permits, licenses and waivers without hesitation. Examples can be provided.
2. When more stringent air quality standards are proposed and supported overwhelmingly by the public, community organizations and environmental organizations, governmental agencies and politically appointed commissioners never support the more stringent proposal and typically will always approve a significantly less stringent requirement that is more favorable to the petroleum industry. Examples can be provided.
3. Air quality management districts allow various credit programs (RECLAIM, ERC's etc.) which offer absolutely no benefit to impacted EJ communities. Governmental agencies have compromised their fiduciary responsibilities to protect the public interests. Every Environmental and EJ organization has requested and demanded the termination of all credit programs since their inception, yet every governmental agency continues to allow them to continue. Examples can be provided.
4. Several independent studies have disclosed the failure of the credit program (RECLAIM, ERC's etc.) yet governmental agencies and policies continue to allow them to exist and fail to acknowledge the existence of the studies and fail to disclose to the public the existence of these studies. Examples can be provided.
5. Governmental agencies and their policies allow them to lie to the public, misrepresent the facts and truth from the public. The public has no idea of their exposure to toxic, carcinogenic and hazardous chemicals and the immediate and long term effects on their lives, health and children.
6. Governmental agencies and their policies allow the Petroleum Industry to not disclose to the public the significant environmental and public health problems they cause and the costs incurred by the public.
7. Governmental agencies and their policies allow the Petroleum Industry to not disclose to the public the number of notices of violations (NOV's), number of repeat violations, number of public complaints, failure of inspectors to



document public complaints and write NOV's because they are never around (Our local AQMD states regularly that there is an inspector on site at every oil refinery yet some how they miss the public witnessed violations) and always arrive to late.

8. Governmental agencies and their policies fail to require that refineries have real time recording and reporting equipment to document every illegal toxic, carcinogenic and hazardous air emissions. Governmental agencies think that the public should report illegal emissions. It is not the public's responsibility to stay awake sitting outside 24hrs day, 7 days a week to catch every refinery illegal activity or accident.
9. Governmental agency fines (AQMD's) are a joke. Refineries cause millions of dollars in environmental damage and millions in public health care costs every year yet receive small insignificant and non-deterrent fines. Our review of oil refinery records show that a typical large fine is approximately \$ 150,000 and average fine is about \$ 10,000. The average for the year is about \$ 200,000. The same governmental agencies fail to disclose to the public that in 2003 and 2004 the lowest net profit for a refinery was \$ 1 billion, the average \$10 billion. We can provide examples.
10. Governmental agencies and policies allow the Petroleum Industry to not pay one dime for public health care costs. Yet there are hundreds of scientific and medical studies documenting that the Petroleum Industry is one of the largest contributors to over 31 different public health diseases. We can provide numerous examples.
11. Governmental agencies and policies allow them to never suspended an oil refinery permit or license. We know of no circumstance where a governmental agency has suspended a permit or license for an oil refinery in the South Coast Air Quality Management District. Yet every oil refinery has received numerous violations, numerous public complaints, numerous fines, numerous equipment breakdowns, had numerous illegal emissions and caused unprecedented public health diseases.
12. Governmental agencies and policies allow AQMD's to approve permits for refineries to have non-stop 24/7 VOC polluting floating roof storage tanks for gasoline, diesel fuel and jet fuel. The same agencies deceived the public when they ordered domes to be placed on storage tanks knowing that these fiberglass domes still allowed VOC's to escape and in the event of an earthquake will spill over. We the public have found out that the Petroleum Industry lied that they are using the Best Available Technology and that AQMD's also lied, when in fact there are vapor recovery systems that can be placed on every sealed storage tank, every loading/unloading terminal and every valve connection etc.. We can provide numerous examples.
13. Governmental agencies and polices fail to require the Petroleum Industry to conduct periodic public health surveys, assess their percentage of impact and fair share of responsibility.
14. Governmental agencies and policies fail to require the Petroleum Industry to

disclose and mandate scientific and medical studies proving the safety of its chemicals and products on public health and the environment.

15. Governmental agencies and policies fail to require the petroleum Industry to pay its fair share of environmental restoration, public health care costs, public transportation infrastructure costs, public utilities costs and public land fill costs.

If CEC and its staff were really concerned with public opinion regarding the Petroleum Industry it should hold a public hearing in every community where an oil refinery and storage tank facility is located instead of hiding in Sacramento where 99% of the public that is impacted can not attend the CEC public hearing, yet convenient for every refinery official, employee, lobbyist, consultant, industry association and chamber of commerce can attend.

16. Governmental agencies and policies have failed to conduct one study to show the disproportionate public health care, illness rates, death rates, economic costs, environmental damage and civil rights violations that EJ communities have incurred.

**c. Identify community benefits from outreach efforts and community advisory groups.**

1. When community organizations are told the truth of the significant negative environmental, public health, safety and economic impacts of projects and CEC decisions on their lives, their children's health they will participate and comment.
2. Our organization was advised by another environmental group of CEC's existence, the reports CEC has been publishing and the significant detrimental impact to local cities and environmental justice communities CEC decisions can have.

As a result we are now submitting our third public comment document. We would submit more and attend more CEC public hearings and meetings if they were local and if we had the funds to travel to Sacramento every few months.

3. We are now providing copies of our CEC public comments to all of our members and to numerous environmental and community organizations. We also provide reports and presentations at community meetings.

**D. Land Use**

- a. **Land use conflicts and exposure to accidents and environmental pollutants will occur more often as competing land uses encroach upon existing petroleum infrastructure.**
- b. **Energy Commission staff plans to work with local governments and the petroleum industry:**

In our opinion this is a lie, the CEC and its staff have been compromised by the

Petroleum Industry to change jurisdiction of permits and licensing to the CEC. Every report that the CEC is currently preparing and proposing involves allowing the Petroleum Industry to grow and expand with no restrictions, conditions or mitigation.

The CEC and its staff with Petroleum Industry support is currently considering removing local city petroleum industry permitting jurisdiction citing petroleum industry growth constraints as the justification.

Currently every community where a refinery and storage tank facility is currently located is against further expansion and is questioning the value or necessity of having a refinery in their community.

We are aware of the fact that the U.S. Military is also influencing its unconditional support of the Petroleum Industry and its growth in complete disregard for the public's interest. The U.S. Military has not proposed or supported one environmental, public health care or environmental justice consideration in all of its decisions and permits. It is a fact the U.S. Army Corps of Engineers has never rejected a Port expansion project which was overwhelmingly opposed by the public.

The U.S. Army Corp of Engineers also lost a lawsuit filed by the Natural Resources Defense Council on behalf of San Pedro residents and supported by Wilmington residents accusing them of failing to comply with NEPA/CEQA in the Port of Los Angeles China Shipping Terminal case when they illegally issued a permit without the preparation of an Environmental Impact Statement/Environmental Impact Report.

**ba. To identify existing and future land use conflicts.**

There is currently conflict and there will be future conflict by every community where a refinery or storage tank facility is located in opposition to any expansion proposal.

**bb To identify prospects for future expansion proposals.**

**E. Public Health and Toxic Pollutants**

**A. Staff will report emissions for the list of chemicals identified in Assembly Bill 2588 " Air Toxic Hot Spots Act " based on:**

**aa. Tons per year**

**ab. Tons of noncriteria pollutants per barrel of crude throughput**

**ac. Tons of noncriteria pollutants per barrel of refined product**

We request that the report include all toxic, carcinogenic and hazardous chemicals and products manufactured, used and stored at Petroleum Industry facilities.

**F. Safety and Hazardous Materials Management**

**A. Staff will not provide analysis of specific petroleum refineries, but will describe industry trends.**

**B. The analysis will examine worker injuries and public exposure to accidental releases.**

1. We request that the analysis include all worker illnesses based on their admittance to hospitals, clinics or medical doctors and deaths. Many workers work related illnesses are not being documented or reported.
2. To avoid governmental reporting requirements companies suggest that employees see their own doctor vs complete mandatory reporting forms. Another trick is to show it as voluntary first aid visit. Employees in fear of losing their jobs will not admit that their illnesses were job caused.
3. The only way to document public exposure is to have a scientific or medical organization determine the exposure and its impact. If the public knows that there is free care available they will request assistance.
4. We request that the analysis include a study of all county hospitals, clinics and health care plans.

**C. Staff will identify the existing data bases regarding accidents associated with petroleum infrastructure and determine their usefulness in characterizing public risks associated with California's petroleum infrastructure.**

**G. Waste Management and Toxic Site Cleanup**

**a. Staff will provide a trends analysis of hazardous waste production from petroleum infrastructure facilities.**

1. We request that the trends analysis also include waste that will result from its chemicals and products that are sold and end up in public waste land fields.
2. We request that the trends analysis also include soil contamination, disposed equipment, pipelines, storage tanks etc. and future demolitions.

1. The primary focus will be on refineries because these are the largest potential source of hazardous wastes.
2. Staff intends to use a base year of 1985, and compare that to production of wastes in more recent years (e.g. 2003).

We request that CEC include the year 2004 which is probably the highest waste production years.

3. Staff will not provide analysis of specific petroleum refineries, but will describe industry trends. Staff will report wastes for:

da. DTSC category A wastes - tons per year per SB 14 reporting cycle.

db. DTSC category B wastes - tons per year per SB 14 reporting cycle.

## **H. Water Quality and Supply**

### **A. Staff will address water supply and quality issues associated with refineries, marine and storage terminals, including:**

1. We request that the study include reporting the number of violations, fines and amount of water contamination.
2. We request that the study include tests of water for the degree of contamination from refineries and storage tank facilities. This shall include all categories of chemicals used, manufactured or produced and particulate matter (smoke stacks, equipment, trucks and trains).

#### **a. Water Consumption**

#### **b. Waste Water Disposal**

#### **c. Storm Water Contamination**

We request that the study include storm water contamination from the thousands of operating and non-operating oil wells and valve connections which are located in communities and residential areas.

## **8. Public, Agency and Industry Participation**

### **A. Staff encourages any interested parties to comment on the proposed scope of work for the Petroleum Infrastructure Environmental Performance Report.**

1. When the CEC held a public hearing in Wilmington/Los Angeles CEC failed to notify and include our local South Coast Air Quality Management District (SCAQMD). CEC also failed to notify and send the SCAQMD information on the public hearing and docket # 04-SIT-1 Causes of Petroleum Development Constraints.
2. There are at least 1,000 environmental organizations in California that the CEC has failed to inform of this and previous CEC public hearings and reports.
3. There are at least 10,000 community organizations in California that the CEC has failed to inform of this and previous CEC public hearings and reports.
4. There are at least 1,000 cities and city environmental commissions in California that the CEC has failed to inform of this and previous CEC public hearings and reports.
5. CEC has failed in the past and currently to send press releases to over 25,000 local newspapers, over 3,000 radio stations and over 1000 television and cable stations which provide free advertisement and most interviews.
6. CEC has failed in the past and currently to send press releases and information to every city, county, state and federal governmental agency and elected official.

### **3. Staff will need the cooperation of the public interest groups, local, regional and state agencies, and industry to provide data, analysis and study results.**

1. There are over 1,000 environmental organizations in California that the CEC has failed to inform of this and previous CEC public hearings and reports.
2. There over 10,000 community organizations in California that the CEC has failed to inform of this and previous CEC public hearings and reports.
3. There over 1,000 cities and city environmental commissions in California that the CEC has failed to inform of this and previous CEC public hearings and reports.

9. **We request that each party participating in the workshop address the following questions:**

A. **What do you believe is the most important issue staff should address in the PIEPR?**

The Public Health Impact and Public Incurred Costs caused by the Petroleum Industry.

B. **What additional areas do you believe the staff should address in its petroleum infrastructure environmental trends analysis?**

1. **Petroleum Industry Oil Well Locations**

In the State of California there are thousands of operating and non-operating oil wells located in residential communities, in residential blocks, near public schools (elementary), child care facilities, near public recreational parks, youth sports fields complexes, public lakes, rivers & beaches, public streets, highways, bridges, public municipal buildings, retail & commercial businesses, senior care facilities and hospitals.

2. **Petroleum Industry Above-Ground Pipeline Valve Connections**

In the State of California there are hundreds of pipeline valve connections located in residential communities, in residential blocks, near public schools (elementary), child care facilities, near public recreational parks, youth sports fields complexes, public lakes, rivers & beaches, public streets, highways, bridges, public municipal buildings, retail & commercial businesses, senior care facilities and hospitals.

3. **Petroleum Industry Train Rail Distribution Routes**

4. **Petroleum Industry Public Transportation Truck Distribution Routes**

5. **Fuel Stations - Gasolene, Diesel, Jet Fuel & Alternative Fuels**

6. **Gas Refineries (Propane, CNG, Methanol etc., Non-Oil/Liquid Fuel Products)**

7. **Gas Industrial/Commercial Manufacturing-Storage Facilities**

C. **What data do you have that could assist staff in conducting its analysis?**

We may have some air quality and water studies that may be of value.

D. **What analysis can you provide that would supplement or improve staff's proposed scope of work?**

**E. What information do local, regional or state agencies need from the Energy Commission to help plan for continued or expanded operation of petroleum infrastructure facilities?**

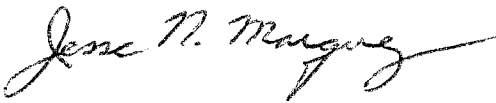
1. Notification of CEC and its Staff counter-public interests intent to remove and bypass local city permitting jurisdiction for the Petroleum Industry.
2. Providing copies of all of CEC's reports and notices to all cities and communities where Petroleum Industry facilities and pipelines are located.

**F. Other comments or suggestions?**

1. We further request that the CEC allow a minimum of 90 days for public comment and that this public comment period be extended.
2. We further request that the CEC hold a public hearing on this docket subject in Wilmington where the highest number of refineries and storage tank facilities are located in or near in the State of California.
3. We further request that the CEC hold a public hearing on this docket subject in every city where a refinery, storage tank facility or port marine terminal is located in the State of California.

The Coalition For A Safe Environment is a non-profit community organization composed of residents, senior citizens, homeowners, students, non-profit organizations, community organizations, committees, business owners, harbor area employees and friends in 10 cities who are concerned with environmental, economic, health, safety and public welfare issues affecting their communities.

Respectfully Submitted In The Public's Interest,



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Daniel Ruvalcaba  
Vice Executive Director

Cecilia L. Ponce-Mora  
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